

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al., 1:04-cv-01076 (GBD)(SN)

MOTION TO ADD ADDITIONAL PLAINTIFFS AGAINST THE TALIBAN

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Jerry S. Goldman, Esq. (“Goldman Declaration”), along with the exhibit attached thereto, the O’Neill Plaintiffs, Plaintiffs added pursuant to the Court’s May 4, 2022, June 15, 2022, June 28, 2022, August 30, 2022, October 31, 2022, and May 28, 2025 Orders (ECF Nos. 7949, 8111, 8150, 8473, 8695, and 10979), and proposed Additional Plaintiffs in the above-captioned matter, by and through their counsel, respectfully move that this Court:

1. Order that the underlying complaint is deemed amended to add the eight (8) plaintiffs listed on Exhibit A (“Additional Plaintiffs”) as plaintiffs against the Taliban;
2. Order that the amendment supplements by incorporation into, but does not displace, the underlying complaint;
3. Order that prior service, orders, and judgments entered in the case remain in effect as to all parties;
4. Order that all parties are bound by all prior rulings made in this case, including the Court’s prior order on service by publication, ECF Nos. 445, 488;
5. Order that the O’Neill liability judgment previously entered for the original O’Neill plaintiffs, ECF Nos. 3067, 3163, 3043-1, and extended to all other previously added plaintiffs, ECF No. 8770, is extended to Additional Plaintiffs herein;

6. Order that Case Management Order #2, ECF No. 247, ¶ 12 applies to Additional Plaintiffs such that re-service of the Taliban is not required;

7. Order that upon granting the Plaintiffs' motion, Plaintiffs' counsel shall add the eight (8) plaintiffs listed on Exhibit A to the Goldman Declaration as a Plaintiff in this case in the Court's CM/ECF system; and

8. Granting such other and further relief that the Court deems just and proper.

Dated: New York, New York
July 17, 2025

Respectfully submitted,

/s/ Jerry S. Goldman

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